

KAFB 94

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Albuquerque Operations Office
Kirtland Area Office
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SEP 08 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Barbara Hoditschek
State of New Mexico Environment
Department
Hazardous and Radioactive Materials Bureau
525 Camino de los Marquez
P.O. Box 26110
Santa Fe, NM 87502

Dear Ms. Hoditschek:

The purpose of this letter is to respond to your letter, dated August 12, 1994, regarding the Department of Energy comments on the draft Hazardous Waste Treatment Permit proposed for the U.S. Department of Defense, Kirtland Air Force Base (KAFB) for an Open Detonation (OD) unit. Our written comments were transmitted by a letter dated June 2, 1994. We have reviewed the proposed permit language changes attached to your August 12, 1994 letter.

We appreciate your acceptance of generator supplied Knowledge of Process (KOP) to characterize the wastes to be demolished at the KAFB OD unit. This agreement will resolve our concern. However, the wording in the permit itself still poses a concern. We apologize if our comments or the discussions in the June 30, 1994 meeting did not clarify the variations possible in the generator supplied data that supports the KOP characterization of the wastes.

The proposed language in Module II, Permit Condition B.1 is somewhat confusing as to the requirement for submittal of an Material Safety Data Sheet (MSDS) and the acceptable variations in generator supplied data. We propose that the condition, "The manufacturer of the explosive shall provide the Permittee Material Safety Data Sheets (MSDS)...", be rewritten as follows:

"The generator of the explosive waste shall provide the Permittee with Materials Safety Data Sheets (MSDS) or equivalent technical information..."

This clarification is necessary because a MSDS is not always available or appropriate (it is just one format for providing technical data necessary for use of KOP in waste characterization) and the DOE generators are not usually the



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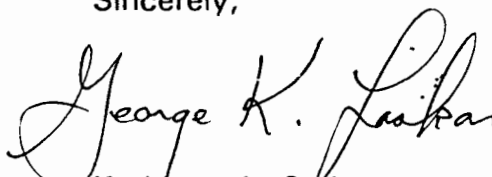
Ms. Barbara Hoditschek

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manufacturer of the explosive wastes in question. If this clarification can be made to the proposed permit language, our concern regarding waste analysis will be fully addressed and we will withdraw our request for a Public Hearing.

Thank you for your attention to this matter. If we can provide additional information, please contact Sue E. Umshler of my staff at (505) 845-6671.

Sincerely,


for Kathleen A. Carlson
Area Manager

cc:

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